

U.S. BANKRUPTCY COURT
FILED
CAMDEN, NJ

08 MAY 19 AM 9:14

UNITED STATES BANKRUPTCY COURT
JAMES J. WALDRON DISTRICT OF NEW JERSEY

BY: mb
DEPUTY CLERK

A Hearing on this matter will be held
on 6/9/08 at 10:00 am
Michael H. Cohen U.S. Courthouse
400 Cooper Street
Camden, NJ 08101
Courtroom 4C

DELAIR GROUP, L.L.C.

C.A. NO. 08-14634 (GMB)

CERTIFICATION OF SERVICE OF THE
MOTION WITH THIS DATE IS REQUIRED
PRIOR TO THE HEARING DATE OR THE
MOTION WILL BE DENIED.

MOTION OF CREDITOR JENNIFER SHEEHAN TO LIFT STAY

Now comes creditor, Jennifer Sheehan, and requests that this Court grant her motion to lift the automatic stay with respect to the debtor, Delair Group, L.L.C.

As grounds, creditor Jennifer Sheehan states that she filed a personal injury/products liability action against Delair L.L.C. relating to injuries sustained in a pool accident which occurred in August 2002. Delair L.L.C. is the manufacturer of the subject pool.

It is Jennifer Sheehan's counsel understanding that Delair, L.L.C. has a commercial insurance policy with limits up to 25 million dollars. In the event of a successful verdict and/or settlement, Jennifer Sheehan will only look to the insurance policy for reimbursement. Ms. Sheehan will not look to the assets of Delair L.L.C. in anyway.

For the above stated reasons, the creditor Jennifer Sheehan requests that she be allowed to pursue her personal injury case which is currently on appeal at the United States Court of Appeal for the First Circuit, Docket # 08-1519.

The creditor,
Jennifer Sheehan,
by her attorneys,



Barry C. Reed, Jr.
Reed & Giordano
101 Tremont Street, Suite 900
Boston, MA 02108

CERTIFICATE OF SERVICE

I, Barry C. Reed Jr., hereby certify that on this date I served copies of **Motion to Lift Stay** by mailing a copy of Same, first class postage prepaid to:

Joseph V. Cavanagh, Jr., Esq.
Blish & Cavanagh, LLP
30 Exchange Terrace
Providence, RI 02903

Signed under the pains and penalties of perjury.



Barry C. Reed, Jr.
Reed & Giordano
101 Tremont Street
Boston, MA 02108
(617) 426-1166

Dated: May 16, 2008

REED & GIORDANO
A PROFESSIONAL ASSOCIATION

**UNITED STATES
BANKRUPTCY COURT**
DISTRICT OF NEW JERSEY
CAMDEN DIVISION

PHILLIP M. GIORDANO
BARRY C. REED, JR

101 TREMONT STREET
BOSTON, MASSACHUSETTS 02
TEL: (617) 426-1166
FAX: (617) 426-5583

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May 19, 2008
10:48:48

May 1

**STAY
08-14634**

Debtor.: DELAIR L.L.C.

Judge.: GLORIA BURNS

Amount.:

\$150.00 CH

Check#.: 1718

Clerk's Office
U.S. Bankruptcy Court
District of New Jersey
P.O. Box 2067
Camden, N.J. 08101

Total-> \$150.00

RE: Delair L.L.C 08-14634 (GMB)

FROM: BARRY C. REED, JR.
101 TREMONT STREET
BOSTON, MA 02108

Dear Sir/Madam,

Enclosed herewith, please find the creditor, Jennifer Sheehan's Motion to Lift Stay with respect to debtor Delair L.L.C. Also, enclosed is the filing fee in the amount of \$150.

Please let me know if a hearing will be held on this matter.

Very truly yours,



Barry C. Reed, Jr.

cc: Joseph V. Cavanagh Jr., Esq.
David E. Maglio